

EXHIBIT A

REDACTED VERSION

OF DOCUMENT

SOUGHT TO BE SEALED

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

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WAYMO LLC,

Plaintiff,

vs.

No. 3:17-cv-00939-WHA

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING,
INC.,

Defendants.

_____/

WAYMO & UBER CONFIDENTIAL ATTORNEYS' EYES ONLY

VIDEOTAPED DEPOSITION OF CAMERON POETZSCHER

SAN FRANCISCO, CALIFORNIA

MONDAY, JUNE 19, 2017

BY: ANDREA M. IGNACIO,
CSR, RPR, CRR, CCRR, CLR
CSR LICENSE NO. 9830
JOB NO. 2642012

1 all, I'm not going to speculate about what will happen 09:18
2 in the future. Second of all, I can say that to date, 09:18
3 we've only paid [REDACTED] for Otto. 09:18

4 MS. ROBERTS: Okay. 09:18

5 Q So, as of today, June 19th, Uber has only 09:18
6 paid [REDACTED] for the acquisition of Otto? 09:18

7 A As far as I'm aware. 09:18

8 Q Has Uber separately paid Anthony Levandowski 09:18
9 or Lior Ron in connection with the acquisition? 09:18

10 A Not that I'm aware of. 09:18

11 Q So, we've spoken about Mr. Levandowski 09:18
12 already. 09:18

13 Do you recall the first time that you met 09:18
14 him? 09:18

15 A I don't recall the exact date, but I believe 09:18
16 it was in -- sometime around September of 2015. 09:18

17 Q September of 2015? 09:18

18 A Uh-huh. 09:18

19 Q And that -- this was the first time you met 09:18
20 him in person? 09:18

21 A Yes. 09:18

22 Q Had you heard of him prior to that? 09:18

23 A Yes, but only just before that meeting; you 09:18
24 know, a matter of days or weeks before that meeting. 09:18

25 Q Okay. So, you first met him at a meeting in 09:18

1 important to have that control right away? 11:34

2 A I mean, it's the same reason [REDACTED] [REDACTED]

3 [REDACTED] [REDACTED] [REDACTED]

4 [REDACTED] 11:34

5 In fact, in relation to what I told you about 11:34

6 the deal originally, in late 2015 it was a 11:34

7 [REDACTED] [REDACTED] [REDACTED]

8 [REDACTED] [REDACTED]

9 [REDACTED] [REDACTED]

10 [REDACTED] [REDACTED]

11 [REDACTED] 11:34

12 Q Why not just hire them as employees of Uber? 11:34

13 A That's essentially what we did; right. 11:34

14 Ultimately, we hired them. [REDACTED] [REDACTED]

15 [REDACTED] [REDACTED]

16 [REDACTED] [REDACTED]

17 [REDACTED] [REDACTED]

18 [REDACTED] [REDACTED]

19 [REDACTED] [REDACTED] [REDACTED]

20 [REDACTED] [REDACTED] [REDACTED]

21 [REDACTED] 11:35

22 Q But what was -- was there a value add to 11:35

23 acquiring NewCo, and with it, the engineers, as 11:35

24 opposed to just hiring those engineers -- 11:35

25 MR. JACOBS: Objection -- 11:35

WAYMO & UBER CONFIDENTIAL - ATTORNEYS EYES ONLY

CERTIFICATE OF REPORTER

I, ANDREA M. IGNACIO, hereby certify that the witness in the foregoing deposition was by me duly sworn to tell the truth, the whole truth, and nothing but the truth in the within-entitled cause;

That said deposition was taken in shorthand by me, a disinterested person, at the time and place therein stated, and that the testimony of the said witness was thereafter reduced to typewriting, by computer, under my direction and supervision;

That before completion of the deposition, review of the transcript [x] was [] was not requested. If requested, any changes made by the deponent (and provided to the reporter) during the period allowed are appended hereto.

I further certify that I am not of counsel or attorney for either or any of the parties to the said deposition, nor in any way interested in the event of this cause, and that I am not related to any of the parties thereto.

Dated: June 20, 2017

A handwritten signature in black ink, appearing to read 'Andrea M. Ignacio', is written over a horizontal line.

ANDREA M. IGNACIO,

RPR, CRR, CCRR, CLR, CSR No. 9830